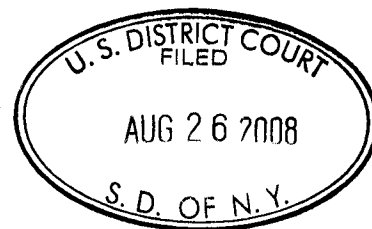


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
ROBERT BURCK d/b/a THE NAKED COWBOY,

Plaintiff,

08 cv 1330 (DC)

- against -

MARS, INCORPORATED AND
CHUTE GERDEMAN, INC.,

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Defendants.
-----X

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kevin T. Mulhearn, a member in good standing of the bar of this Court, hereby move for an order allowing the admission pro hac vice of:

Applicant's Name: Ethan N. Halberstadt
Firm Name: Halberstadt Curley LLC
Address: 1100 E. Hector Street, Suite 425
City/State/Zip: Conshohocken, PA 19428
Phone Number: (610) 834-8819
Fax Number: (610) 834-8813

Kevin T. Mulhearn is a member in good standing of the Bar of the State of New York.

There are no pending disciplinary proceeding against Ethan N. Halberstadt in any State or Federal Court.

Dated: August 15, 2008
Orangeburg, NY 10962

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin T. Mulhearn', with a horizontal line drawn underneath it.

Kevin T. Mulhearn (KM 2301)
Kevin T. Mulhearn, P.C.
60 Dutch Hill Road, Suite 8
Orangeburg, NY 10962
Phone Number: (845) 398-0361
Fax Number: (845) 398-3836

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROBERT BURCK d/b/a THE NAKED COWBOY,

Plaintiff,

08 cv 1330 (DC)

- against -

MARS, INCORPORATED AND
CHUTE GERDEMAN, INC.,

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Defendants.

-----X

Upon the motion of Kevin T. Mulhearn, Esq., attorney for Plaintiff, Robert Burck, and said sponsor attorney's affidavit in support:

Applicant's Name: Ethan N. Halberstadt

Firm Name: Halberstadt Curley LLC

Address: 1100 E. Hector Street, Suite 425

City/State/Zip: Conshohocken, PA 19428

Phone Number: (610) 834-8819

Fax Number: (610) 834-8813

is admitted to practice pro hac vice as counsel for Plaintiff, Robert Burck, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: August 15, 2008
New York, New York

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROBERT BURCK d/b/a THE NAKED COWBOY,

Plaintiff,

08 cv 1330 (DC)

- against -

MARS, INCORPORATED AND
CHUTE GERDEMAN, INC.,

**AFFIDAVIT OF KEVIN T.
MULHEARN IN SUPPORT
OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Defendants.

-----X

State of New York)
) ss:
County of Rockland)

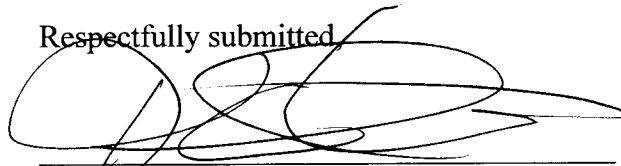
Kevin T. Mulhearn, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Ethan N. Halberstadt as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the Bar of the State of New York and was admitted to practice law in July, 1991. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Ethan N. Halberstadt since September, 1987.
4. Ethan N. Halberstadt is an associate of the law firm of Halberstadt Curley, LLC, in Conshohocken, Pennsylvania.
5. I have found Ethan N. Halberstadt to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Ethan N. Halberstadt, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Ethan N. Halberstadt, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

WHEREFORE, it is respectfully requested tat the motion to admit Ethan N. Halberstadt, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: August 15, 2008
Orangeburg, New York

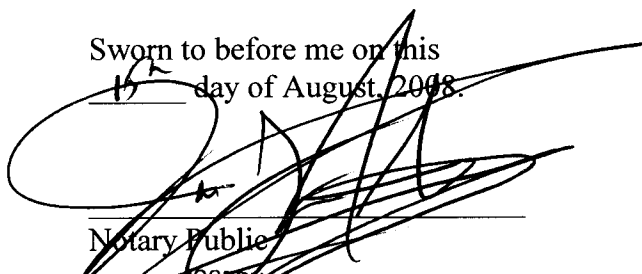
Respectfully submitted,



Kevin T. Mulhearn, Esq.

SDNY Bar Code: KM2301

Sworn to before me on this
15 day of August, 2008.



Notary Public
JOSEPH J. ARTRIP
Notary Public, State of New York
Reg. No. 02AR6122369
Qualified in Orange County
Commission Expires February 7, 2011

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROBERT BURCK d/b/a THE NAKED COWBOY,

Plaintiff,

08 cv 1330 (DC)

- against -

MARS, INCORPORATED AND
CHUTE GERDEMAN, INC.,

AFFIDAVIT OF SERVICE

Defendants.


-----X

CHRISTOPHER J. FOY, being duly sworn, deposes and says that:

I am not a party to this action, am over the age of 18 years, and reside in the Town of Ramapo, New York.

On August 18, 2008, I served a true and accurate copy of the Motion to Admit Ethan N. Halberstadt Pro Hac Vice (with all required supporting documents) upon the following persons at the following address, via priority mail, by depositing same in a United States mail depository:

Joseph R. Price
Arent Fox, LLP
1050 Connecticut Ave., N.W.
Washington D.C. 20036



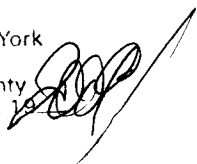
CHRISTOPHER J. FOY

Sworn to before me on
this 15 day of August, 2008.



NOTARY PUBLIC

KEVIN T. MULHEARN
Notary Public, State of New York
No. 02MU5047687
Qualified in Rockland County
Commission Expires August 7, 2011



Certificate of Good Standing



United States of America

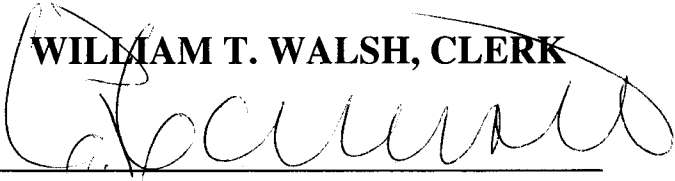
District of New Jersey

I, WILLIAM T. WALSH, Clerk of the United States District Court for the District of New Jersey, do hereby certify that:

Ethan N. Halberstadt

was duly admitted to practice in said Court as of December 1, 1990, and is in good standing as a member of the Bar of said Court.

*Dated at Newark, New Jersey
on: August 6, 2008*

By  **WILLIAM T. WALSH, CLERK**
Carey P. Carlisle, Deputy Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA



I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Ethan N. Halberstadt , Bar # 57544, was duly admitted to practice in said Court on April 24, 1990 , and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

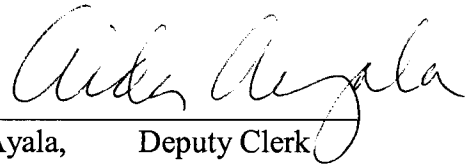
Clerk of Court

on August 5, 2008.

BY

Aida Ayala,

Deputy Clerk

A handwritten signature in cursive script, reading "Aida Ayala", is written over a horizontal line. The signature is in black ink.

